

REMARKS

The Office Action, dated September 10, 2007, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Following the present amendment, claims 1-9, 11-15, and 17-23, and 25-26 are currently pending in the present application, including independent claims 1, 13, 17, 22, and 25. In particular, Applicants herein amended claims 1-9, 11-15, and 17-23, cancelled claims 10, 16, and 24 without prejudice or disclaimer, and added new claims 25 and 26 to more particularly point out and distinctly claim the invention. It is respectfully submitted that the present amendment added no new subject matter to the present application and serves only to more particularly point out and distinctly claim the invention. Applicants urge that all grounds for rejection in the Office Action are addressed in this Response and that the present application is currently in condition for allowance in view of the amendment and the following arguments. Therefore, reconsideration and allowance of the claims are respectfully requested.

Rejection under 35 U.S.C. §102(e)

The Office Action rejected claims 1-9, 13-15, and 22-23 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 7,146,418 (Bahl). According to the Office Action, Bahl discloses every claimed recitation of claims 1-9, 13-15, and 22-23. However, as will be discussed below, Bahl does not disclose the recited elements of any

of claims 1-9, 13-15, and 22-23. Thus, this rejection is respectfully traversed, and reconsideration is requested.

Independent claim 1, from which claims 2-9, 11-12, and 20 depend, recites a method. The method includes configuring an anchor node in a communication network wherein the configuring includes first requesting to initiate a communication session for a first terminal via a communication management node of the communication network. The configuring further includes first establishing, at the anchor node a binding for the first terminal upon request by the communication management node. The configuring further includes forwarding the first requesting to initiate from the communication management node based on the established binding towards a second terminal, and acknowledging the first requesting to initiate by the second terminal to the communication management node. Also, the configuring includes second establishing, at the anchor node, a binding for the second terminal upon request by the communication management node. The method of claim 1 also includes communicating data in the communication session between the first terminal and the second terminal. The communicating includes transmitting the data to be communicated from the first terminal to an anchor node, the anchor node configured to store a table of respective bindings for the terminals. The communicating also includes relaying the data to be communicated from the anchor node towards a filtering node of the network using the configured bindings for the terminals. The communicating further includes filtering, at the filtering node, the data to be communicated based on the bindings for the terminals.

Independent claim 13, from which claims 14-15 and 21 depend, relates to an apparatus that includes a receiver configured to receive a first binding request for establishing a first binding for a first terminal requesting a communication session initiation from a communication management node, and configured to receive a second binding request for establishing a second binding for a second terminal to be involved in the communication session from the communication management node. The recited apparatus further includes a processor configured to establish the first binding for the first terminal in response to the received binding request and returning the binding to the communication management node, and configured to establish the second binding for the second terminal upon request by the communication management node. The recited apparatus further includes a memory configured to store a table of respective configured bindings for the terminals. The receiver is further configured to receive data to be communicated from the first terminal to the second terminal, and the processor is further configured to relay the data to be communicated towards a filtering node of the network using the configured bindings for the terminals.

Independent claims 22, from which claim 23 depends, recites a system that includes first requesting circuitry configured to first request to initiate a communication session for a first terminal via a communication management node of the communication network. The system further includes a first establishing circuitry configured to first establish, at an anchor node, a binding for the first terminal upon request by the communication management node. The system further includes forwarding circuitry configured to forward the first requesting to initiate from the communication

management node based on the established binding towards a second terminal. The system further includes first acknowledging circuitry configured to acknowledge the first requesting to initiate by the second terminal to the communication management node. Also, the system includes second establishing circuitry configured to second establish , at the anchor node, a binding for the second terminal upon request by the communication management node. The system further includes a transmitter configured to transmit the data to be communicated from the first terminal to an anchor node, the anchor node configured to store a table of respective bindings for the terminals. Relaying circuitry in the system are configured to relay the data to be communicated from the anchor node towards a filtering node of the network using the configured bindings for the terminals. Also, filtering circuitry in the system are configured to filter, at the filtering node, the data to be communicated based on the bindings for the terminals.

Independent claim 25 recites a system that includes first requesting means for first requesting to initiate a communication session for a first terminal via a communication management node of a communication network, and first establishing means for first establishing at an anchor node, a binding for the first terminal upon request by the communication management node. Forwarding means forward the first requesting to initiate from the communication management node based on the established binding towards a second terminal. Acknowledging means acknowledge the first requesting to initiate by the second terminal to the communication management node. Second establishing means second establish at the anchor node, a binding for the second terminal upon request by the communication management node. Then, transmitting means

transmit the data to be communicated from the first terminal to an anchor node, the anchor node configured to store a table of respective bindings for the terminals. Relaying means relay the data to be communicated from the anchor node towards a filtering node of the network using the configured bindings for the terminals. Filtering means filter, at the filtering node, the data to be communicated based on the bindings for the terminals.

As outlined below, Applicant submit that the cited reference of Bahl does not teach or suggest the elements of claims 1-12, 16-18, and 22-23.

Bahl discloses a communication setting under consideration of an involvement of the Internet protocol, wherein transparency is to be provided. In particular, Bahl generally relates to providing transparent mobility support through a mobile service in an API layer of an operating system to leverage the capability of a session establishment service that implements the Session Initiation Protocol or the like for locating a remote node for session setup and detecting address change of the remote node. When an application on a correspondent host (CH) wants to communicate with a second application on a mobile host (MH), the mobility service of the CH uses the session establishment service to locate the mobile host and set up a session with it, and then sets up a transport data channel for the session. When the MH changes its network address, the session establishment service of the CH finds out the new address through the operation of the session establishment protocol and reestablishes the session with the MH. The new address of the MH is then communicated to the CH's mobility service, which resets the data channel to connect to the new address,

thereby allowing communication data from the first application to continue to flow to the MH.

As such, Bahl is not concerned at all with considerations in connection with a firewall and packet filtering as recited in claim 1. In particular, the embodiment of the present application recited in claim 1 relates to a secure and authorized anchor node that is created so that communication can be routed through the anchor node before a firewall performs packet filtering. Further, a translator gateway constitutes this anchor node. Although Applicants urge that claim 1 is distinguishable over Bahl, claim 1 has been amended to further clarify these distinctions and to expedite the examination and allowance of the present application.

Thus, Applicants note that Bahl does not teach or suggest at least the following recitations from claim 1 (emphasis added):

communicating data in the communication session between the first terminal and the second terminal, wherein the communicating comprises:

transmitting the data to be communicated from the first terminal to an anchor node, the anchor node configured to store a table of respective bindings for the terminals,

relaying the data to be communicated from the anchor node towards a filtering node of said network using the configured bindings for the terminals, and

filtering, at said filtering node, said data to be communicated based on the bindings for said terminals.

Accordingly, the anchor node binding methodology recited in present claim 1 is not suggested with respect to providing transparency in the settings disclosed by Bahl.

In particular, Applicants note that Bahl does not disclose or suggest, in any way, at least the filtering of the transmission at the filter node based upon the bindings.

Therefore, Applicant respectfully urge that the rejection of claim 1 under 35 U.S.C. §102(e) should be withdrawn because Bahl does not teach or suggest each feature of that claim. Claims 2-9, 11-12 and 20 depend from claim 1 and are likewise allowable on similar grounds. Accordingly, reconsideration and allowance of claims 1-9, 11-12 and 20 are respectfully requested.

Similarly, independent claims 13 and 22, although different in scope from claim 1 and rejected on different grounds, also contain similar recitations related to creating bindings between an anchor node and two network terminals, and then using those bindings to filter communications through a filtering node such as a firewall. Thus, Bahl similarly fails to teach or suggest each and every limitation recited in claims 13 and 22, and for at least this reason, Applicants urge that the rejection of these claims in view of Bahl is clearly improper. Likewise, claims 14-15, 21 and 23 depend from either of claims 13 and 22 and should be allowed on similar grounds. Withdrawal of this rejection of claims 13-15 and 21-23 and reconsideration of these claims in view of these arguments are respectfully requested.

Similarly, new independent claim 25, although different in scope from claims 1, 13, and 22 and rejected on different grounds, also contain similar recitations related to creating bindings between an anchor node and two network terminals, and then using those bindings to filter communications through a filtering node such as a firewall. Thus, Bahl similarly fails to teach or suggest each and every limitation recited in claim 25, and

for at least this reason. Likewise, claim 26 depends from claim 25 and should be allowed on similar grounds. Consideration and allowance of claims 25-26 in view of these arguments are respectfully requested

The Office Action further rejected claims 17-19 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,954,790 (Forslow). According to the Office Action, Forslow discloses every claimed recitation of claims 17-19. However, as will be discussed below, Forslow does not disclose the recited elements of any of claims 17-19. Thus, this rejection is respectfully traversed, and reconsideration is requested.

Independent claim 17, from which claims 18-20 depend, recites a device that includes a receiver configured to receive data to be communicated from a first terminal to a second terminal, the data being received from an anchor node maintaining bindings for the terminals. The device of claim 17 further includes a processor configured to analyze the bindings for the terminals, and a filter configured to filter the data dependent on the result of the analysis.

As outlined below, Applicant submit that the cited reference of Forslow does not teach or suggest the elements of claims 17-19.

Forslow is concerned with security technology involving traffic filtering. For example, Forslow is generally directed to a network-based mobile workgroup system to provide relatively seamless mobility across a number of access technologies at the same time as it offers a granular security separation down to workgroup level. In particular, the mobile workgroup system is an access management system for mobile users with VPN and firewall functionality inbuilt. The mobile user can access the

mobile workgroup system over a set of access technologies and select server resources and correspondent nodes to access pending their workgroup membership approvals. All workgroup policy rules are defined in a mobile service manager and pushed down to one or more mobile service routers for policy enforcement. The mobile service router closest to the mobile client, and being part of the mobile virtual private network, performs regular authentication checks of the mobile client during service execution. At the same time it performs traffic filtering based on the mobile user's workgroup memberships. However, Forslow does not teach or suggest the use of bindings prior to the filtering.

Bahl discloses a communication setting under consideration of an involvement of the Internet protocol, wherein transparency is to be provided. Forslow is concerned with security technology involving traffic filtering. Thus, Applicants urge that Forslow does not disclose or suggests with a filter node the enables a firewall and packet filtering as recited in claim 17. In particular, the embodiment of the present application recited in claim 17 relates to a filtering node that cooperates with a secure and authorized anchor node that is created so that communication can be routed through the anchor node before a firewall performs packet filtering. Although Applicants urge that claim 17 is distinguishable over Forslow, claim 17 has been amended to further clarify these distinctions and to expedite the examination and allowance of the present application. For example, Applicants urge that Forslow does not teach or suggest the recitation from claim 17 that an anchor node maintains bindings with two or more involved terminals.

Therefore, Applicant respectfully urge that the rejection of claim 17 under 35 U.S.C. §102(e) should be withdrawn because Forslow does not teach or suggest each feature of that claim. Claims 18-19 depend from claim 17 and are likewise allowable on similar grounds. Accordingly, reconsideration and allowance of claims 17-19 are respectfully requested.

Rejection under 35 U.S.C. 103(a)

The Office Action further rejected claims 10-12, 16, 20-21, and 24 under 35 U.S.C. §104(a) as being anticipated by Bahl in view of Forslow. According to the Office Action, Forslow discloses every claimed recitation of independent claims 10, 16, and 24 (now cancelled) except for relaying data from an anchor node to a filtering node, but that these deficiencies are addressed by Forslow. However, as will be discussed below, the combination of Bahl and Forslow does not disclose the recited elements of any of currently pending claims 11-12 and 20-21. Thus, this rejection is respectfully traversed, and reconsideration is requested.

As described the arguments above, Bahl discloses a communication setting under consideration of an involvement of the Internet Protocol, wherein transparency is to be provided, and Forslow generally relates to security technology involving traffic filtering. Nevertheless, Applicants urge that the combination of Bahl and Forslow does not disclose or suggests with a binding between anchor node and terminals and then using the bindings for packet filtering through a filtering node recited in claim 1. In particular, as described above, the embodiment of the present application recited in claim 1 relates

to using the combination of an anchor node configuration with a firewall performing packet filtering so that communication is routed through the anchor node before the packet filtering is performed.

Consequently, Applicants urge that independent claims 1 and 13 are distinguishable over the combination of Bahl and Forslow because these references do not teach or suggest recitations related to first creating bindings between the terminals and an anchor node, and then using these bindings to in filtering data at a filtering node. Claims 11-12 and 21-22 depend, respectively, from claims 1 and 13 should, therefore, be allowed on similar grounds. Accordingly, reconsideration and allowance of claims -12 and 21-22 are respectfully requested.

Moreover, Applicants urge that the combination of Bahl and Forslow is legally incorrect. In particular, the Office Action failed to show any motivation a skilled person would have to combine both teachings. Telecommunications is a field of relatively narrow patents in which patentable innovation is often through small increments. Moreover, Applicants urge that that Bahl and Forslow could not be combined without extensive experimentation and effort because there would be no reasonable expectation of success without improperly viewing the present application in hindsight. Also, there is no suggestion or mention of the technical problems addressed through the present application in either Bahl or Forslow. Accordingly, the rejection under 35 U.S.C. 103(a) is legally improper and should be withdrawn. Reconsideration and allowance of claims 11-12 and 21-22 are respectfully requested on this separate ground.

Conclusion

As discussed above, each of claims 1-9, 11-15, and 17-23, and 25-26 (including independent claims 1, 13, 17, 22, and 25) recites subject matter which is neither disclosed nor suggested in the cited prior art. Applicants submit that the recited subject matter is more than sufficient to render the invention non-obvious to a person of ordinary skill in the art. It is respectfully requested that independent claims 1, 13, 17, 22, and 25 and the related dependent claims be allowed in view of the above arguments, comments, and remarks.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, stylized capital 'D' followed by a long, horizontal, slightly wavy line extending to the right.

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